

EXHIBIT A

Proposed Form of Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BSG RESOURCES LIMITED (in administration),

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 19-11845 (SHL)

**ORDER GRANTING MOTION OF THE JOINT ADMINISTRATORS FOR LEAVE TO
FILE UNDER SEAL CERTAIN CONFIDENTIAL EXHIBITS**

Upon the *Motion of the Joint Administrators for Leave to File Under Seal Certain Confidential Exhibits* dated May 29, 2020 (the “Motion to Seal”);² and the Court having found that it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b); and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of the Motion to Seal in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court having found that the Joint Administrators provided appropriate notice of the Motion to Seal and no other notice need be provided; and the Court having determined that the legal and factual bases set forth in the Motion to Seal establish just cause for the relief granted herein,

IT IS HEREBY ORDERED THAT:

1. The Motion to Seal is granted as set forth herein.
2. The Joint Administrators are authorized to file under seal Exhibits B and C (the “Confidential Exhibits”) to their *Reply in Support of Their Motion for an Order (I) Affirming Confidentiality Designations and (II) Modifying the Court’s Confidentiality Stipulation* [Docket

² Capitalized terms not otherwise defined herein shall have the meaning set forth in the Motion to Seal.

No. 100]. The Joint Administrators shall provide an electronic copy of this Order and the Confidential Exhibits to the Clerk of the Court.

3. Except upon further order of the Court, the Confidential Exhibits shall remain under seal, and shall not be made available to anyone without the consent of the Joint Administrators, except that copies of the Confidential Exhibits shall be provided to (a) the Court, and (b) any other party as may be ordered by the Court or agreed to by the Joint Administrators. Each party to whom disclosure is made shall keep the Confidential Exhibits confidential.

4. The Joint Administrators are authorized to take all actions necessary to effectuate the ruling set forth in this Order.

5. The Joint Administrators are authorized to seek to unseal or dispose of the Confidential Exhibits at the conclusion of the proceedings.

6. This Order is without prejudice to the rights of any party in interest, to seek to unseal the Confidential Exhibits or any part thereof.

7. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: _____, 2020
New York, New York

The Honorable Sean H. Lane
United States Bankruptcy Judge